

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DIANE SHEARS

PLAINTIFF

vs.

No. 1:22-cv-2099-LAH

**AMERICAN PUBLIC DEFENSE, INC.,
and LEWIS BROWN**

DEFENDANT

DECLARATION OF ATTORNEY JOSH SANFORD

Pursuant to 28 U.S.C. § 1746, Josh Sanford declares, subject to the penalties for perjury, as follows:

1. My name is Josh Sanford, and I am over the age of 18 and duly qualified to execute this Declaration and to swear to the accuracy of the facts herein contained.
2. I am an attorney licensed and in good standing in the State of Arkansas. I practice law with the law firm of Sanford Law Firm, PLLC (hereinafter “Sanford Law Firm”), which is located in Little Rock, Arkansas, which I founded in Russellville in 2001. I opened an office in Little Rock in 2009 and now predominantly practice in the Arkansas District Courts, together with a busy Western District of Texas practice. We have had eight offices throughout the U.S., and we have had attorneys living and working in five states.
3. I practice law full-time, and I manage the other attorneys in the Sanford Law Firm. See “Team,” Sanford Law Firm, <https://www.sanfordlawfirm.com/team/> (last viewed 14 June 2022).
4. Sanford Law Firm has been recognized as being the premier prosecutor of

wage theft violation cases in all federal courts across the United States. <https://unicourt.com/blog/us-district-courts-labor-litigation-2020/> (last visited 2 July 2021).

5. In the course of my law practice, I engage in a significant amount of wage and hour litigation—specifically cases arising under the Fair Labor Standards Act (FLSA) and the comparable Arkansas Minimum Wage Act (AMWA). A significant portion of my caseload is in various federal courts around the United States, including trial work in cases arising under Title VII of the Civil Rights Act of 1964, the Equal Pay Act, the FLSA, and the Family and Medical Leave Act.

6. I am licensed to practice law in all state and federal courts in the States of Arkansas, Colorado, and Texas. I am also actively engaged in appellate practice. I have handled cases before almost all county Circuit Courts in the Central and River Valley regions of Arkansas, the United States District Courts for the Eastern and Western Districts of Arkansas, the United States District Courts for the Eastern, Southern, Northern and Western Districts of Texas, United States District Court for the Northern District of Oklahoma, United States District Court for the Southern District of Ohio, the United States District Court for the District of Colorado, the United States District Court for the Eastern District of Michigan, the District Court of Nebraska, the United States District Court for the District of Oregon, and the Fifth, Sixth and Eighth Circuit Courts of Appeals—as well as several other district courts.

7. There is no group of attorneys within 600 miles of Little Rock who have experience comparable to Sanford Law Firm in wage litigation. Including cases currently being prosecuted throughout the country today, Sanford Law Firm has prosecuted over 1,300 wage cases in federal and state courts and in arbitration proceedings. In 2018,

only one firm in the United States initiated more wage violation prosecutions than Sanford Law Firm. In 2020, as noted above, Sanford Law Firm ranked first.

8. In 2005, I was voted “Best Attorney” (tie) in a readers’ poll published by *The Courier* in Russellville, Arkansas. Subsequently, in 2008, I served as the President of the Pope County Bar Association. In addition, I am or have been a member of the American, Arkansas, and Pope County Bar Associations, the Arkansas Trial Lawyers Association, and the National Employment Lawyers Association.

9. I have been lead counsel on numerous wage and hour cases filed in United States District Courts throughout the nation, including the following: *Craig Lyons, et al. v. Con Agra*, 4:12-cv-245-JM (E.D. Ark.) (over 790 plaintiffs); *Keyli Cruthis, et al. v. Visions, et al.*, 4:12-cv-244-KGB (E.D. Ark.); *James Finley v. Universal Pressure Pumping, Inc.*, SA:12-ca-0654-OG (Western District of Texas); *Michael Alexander v. Hahn Appliance Center, Inc.*, 12-CV-257-CVE-TWL (N.D. Okla.); *Chad Lochridge, et al. v. Lindsey Management, et al.*, 5:12-CV-5047-JLH (W.D. Ark.); *Bill Hollomon, et al. v. AT&T Mobility Services, LLC*, 4:11-cv-600-BRW (E.D. Ark.); *Jeffrey Bacon, et al. v. Eaton Aeroquip, LLC*, 2:11-cv-14103-GD (E.D. Mich.); *Karen “Kay” Roland v. Sharp County Post 336, et al.*, 1:11-CV-85-DPM (E.D. Ark.); *Bennie Watson, et al. v. Surf-Frac Wellhead Equipment Company, Inc.*, 4:11-CV-843 (JLH) (E.D. Ark.); *Robert Terry, et al. v. City of Ola*, 4:11-cv-11-645 (JLH) (E.D. Ark.); *Donald Bateman, et al. v. Frac Tech Services, LLC*, 6:11-cv-708 (E.D. Tex.); *Kalie Brown, et al. v. Barney’s Barn, Inc., d/b/a/ Peaches Gentlemen’s Club*, 4:11-cv-224 (SWW) (E.D. Ark.); *Jason Phillips v. Oil Patch Water and Sewer Services, LLC, et al.*, 4:11-cv-776 (JLH) (E.D. Ark.); *David Delock, et al. v. Securitas Security Services USA, et al.*, 4:11-CV-520 (DPM) (E.D. Ark.); *Karen Springs, et al. v.*

First Student, Inc., 4:11-CV-00240 (BSM) (E.D. Ark.); *Teramura v. Walgreen Co.*, 5:12-cv-5244-JLH (W.D. Ark.), and many others.

10. I have also been lead counsel on numerous wage and hour cases that resulted in settlements or judgments in favor of my clients including the following: *Coby Pearce v. Frac Tech Services, LLC*, No. 4:12-cv-651-JLH (E.D. Ark.); *Nicole Collins v. Barney's Barn, Inc., et al.*, No. 4:12-cv-685-SWW (E.D. Ark.); *Joseph Gauthier, et al. v. Trican Well Service, L.P.*, No. 6:13-cv-46-LED (E.D. Tex.); *Jason Roche, et al. v. S-3 Pump Service, Inc.*, No. 5:15-cv-268-XR (W.D. Tex.); *Kristen Whitworth, et al. v. French Quarter Partners, LLC*, No. 6:13-cv-6003-RTD (W.D. Ark.); *Robert Terry v. Yell County Ark.*, No. 4:13-cv-408-SWW (E.D. Ark.); *Jessica Guinn v. D J Trucking*, No. 4:13-cv-559-KGB (E.D. Ark.); *Maria Romero de Lopez, et al. v. Ozark Mountain Poultry, Inc.*, No. 5:13-cv-5272-TLB (W.D. Ark.); *Sean Jordan v. Big E. Foods, Inc.*, No. 4:14-cv-205-BRW (E.D. Ark.); *Patricia Hernandez, et al. v. Simmons Foods, Inc.*, No. 5:14-cv-5159-JLH (W.D. Ark.); *Sean Schneider v. Habitat for Humanity International, Inc.*, No. 5:14-cv-5230-TLB (W.D. Ark.); *Pedro Espinoza v. Car-Son Construction, LLC*, No. 4:14-cv-467-KGB (E.D. Ark.); *Sheila Lyles v. City of Trumann, Ark.*, No. 3:14-cv-210-DPM (E.D. Ark.); and *Kellie McCartney v. Baily and Thompson Tax and Accounting, P.A.*, No. 4:14-cv-561-SWW (E.D. Ark.).

11. I have also been lead counsel on several wage and hour cases in which collective actions have been granted including *Sam Adams v. United Cerebral Palsy of Central Ark., Inc.*, No. 4:16-cv-930-JLH (E.D. Ark.); *James Harris, et al. v. Express Courier International, Inc.*, No. 5:16-cv-5033-TLB (W.D. Ark.); and *Dustin Moore, et al. v. Performance Pressure Pumping Services, LLC*, No. 5:15-cv-432-XR (W.D. Tex.), and

dozens of others.

12. Since January of 2015, Sanford Law Firm has filed and prosecuted over 1,100 distinct wage lawsuits throughout Arkansas and Texas. We have also filed cases in Ohio, Kentucky, Tennessee, North Carolina, South Carolina, Florida, Georgia, Alabama, Mississippi, Louisiana, Missouri, and Illinois. Many of these lawsuits are or were group or collective actions, as well as several class actions under Rule 23.

13. Collectively, cases filed by the Sanford Law Firm since 2009 have resulted in far more than \$13,000,000.00 in settlements and judgments for wage and hour violations for more than three thousand clients across the nation.

14. The National Association of Legal Fee Analysis (NALFA) reports, based on a national survey of more than 2,000 litigators, that the average rate for plaintiffs' attorneys engaged in complex litigation in 2020 was \$445.00 per hour. See "NALFA Releases 2020 Average Hourly Rates in Litigation," NALFA, <http://www.thenalfa.org/blog/nalfa-releases-2020-average-hourly-rates-in-litigation/> (last visited 5 April 2021). The hourly rates requested for attorneys, in this case, all fall below the NALFA average with the exception of my hourly rate, which is slightly higher than the NALFA average but is consistent with my qualifications.

15. The rates charged by Sanford Law Firm's attorneys are reasonable. The rates are reflective of the number of years each attorney has practiced, the attorneys' expertise in employment issues such as the FLSA, the contingent nature of an award of fees, and the rates charged by other attorneys specializing in FLSA work. The staff time and hourly rate for the Sanford Law Firm below are likewise reasonable and comparable.

16. Individual billing requested in this case, including the requested hourly rates

for each attorney and support staff member, is summarized below:

Billed By	Rate	Time	Value
Anna Stiritz	\$400.00	0.20	\$80.00
Colby Qualls	\$220.00	6.90	\$1,518.00
Courtney Lowery	\$220.00	2.60	\$572.00
Josh Sanford	\$470.00	2.40	\$1,128.00
Michael Stiritz	\$110.00	0.30	\$33.00
Stacy Gibson	\$290.00	2.30	\$667.00
Vanessa Kinney	\$400.00	1.9	\$760.00
Rebecca Matlock	\$220.00	2.6	\$440.00
Law Clerk	\$110.00	6.20	\$682.00
Paralegal	\$125.00	4.40	\$550.00
Staff	\$90.00	1.50	\$135.00
Grand Total		27.60	\$6,158.00

17. Each attorney's hourly rates are supported by their skills and experience, some of which are described more thoroughly below:

- a. Attorney Anna Stiritz is a 1991 graduate of the University of Arkansas at Little Rock (UALR), William H. Bowen School of Law. Ms. Stiritz received her undergraduate degree from Wheaton College in 1989. Ms. Stiritz initially focused her practice on adoption-related cases as well as dependency-neglect cases in juvenile court, but has since focused her practice on the Sanford Law Firm's employment practice, including an emphasis on assessing employee claims and managing and coordinating with class members in the firm's FLSA-based collective actions.
- b. Colby Qualls graduated from the University of Central Arkansas ("UCA"), Summa Cum Laude, in 2015 with a B.A. in Political Science and Sociology. After graduating from UCA, he attended the William H. Bowen School of Law and the Clinton School of Public Service to pursue concurrently a law degree and Master of Public Service. While attending law school, he served on the UA Little Rock Law Review Editorial Board and the Bowen Competition Trial Team, and he earned a Top Paper Award, among other classes, in Employment Law. Mr. Qualls was admitted to practice in the State of Arkansas in 2019. Prior to joining Sanford Law Firm, Mr. Qualls clerked for a superior court judge in Anchorage, Alaska. He moved back to Arkansas in early 2020, where he practiced civil litigation in Little Rock. His practice with Sanford Law Firm focuses on employment litigation, particularly the Fair Labor Standards Act (FLSA) and Arkansas Minimum Wage Act (AMWA) litigation.

- c. Attorney Courtney Lowery graduated from Arizona State University, Magna Cum Laude, in 2012 with a B.A. in English Literature. After the Air Force stationed her husband in Arkansas, she attended William H. Bowen School of Law, during which she served on the Law Review Editorial Board and was a member of the Student Animal Legal Defense Fund as well as the student chapter of the Arkansas Association of Women Lawyers. She graduated in 2019, Magna Cum Laude, and began working at Sanford Law Firm as an employment lawyer with a focus on the Fair Labor Standards Act.
- d. Michael Stiritz joined Sanford Law Firm as an attorney in 2021, following three years with the firm as a law clerk. Her work as a law clerk at Sanford Law Firm focused on the firm's wage cases, a focus that continued into her work as an attorney. Ms. Stiritz graduated *summa cum laude* in 2021 from the University of Arkansas at Little Rock Bowen School of Law, where she graduated first in her class and earned twenty-four top paper awards. She served as Executive Editor of the UALR Law Review, which published her article in Spring of 2021. She also holds a Masters in English from Arkansas Tech University.
- e. Attorney Stacy Gibson graduated cum laude from the University of Arkansas School of Law in 2014. While attending law school. Ms. Gibson was a Note and Comment Editor for the Journal of Food Law & Policy. Ms. Gibson litigated family law, probate, and general civil matters throughout the state before focusing her practice on FLSA cases. She has served as co-counsel on numerous single-plaintiff and collective action FLSA cases in Arkansas district courts and in arbitration, as well as served as lead counsel in a collective action for a group of 189 plaintiffs in the Southern District of Mississippi. She has litigated several FLSA cases for law enforcement officers, including this one. Ms. Gibson is a member of the Arkansas Trial Lawyers Association. Ms. Gibson has worked on hundreds of wage cases.
- f. Attorney Vanessa Kinney is a 2007 high honors graduate of the University of Arkansas at Little Rock, William H. Bowen School of Law, graduating eighth in her class. While attending law school, Ms. Kinney was a member of the University of Arkansas at Little Rock Law Review, and had an article published in the Winter of 2006 issue. While attending Law School, Ms. Kinney served in the Law School's Litigation Clinic under special license to practice law under the supervision of a licensed attorney. Since joining Sanford Law Firm, Ms. Kinney has served as both lead attorney and co-counsel on bench and jury trials in both federal and state courts and currently focuses primarily on briefing issues in FLSA cases. Ms. Kinney focuses her practice primarily in the area of employment law, particularly the Fair Labor Standards Act and Arkansas Minimum Wage Act.

Ms. Kinney's wage and hour experience dates back to 2010, and she has experience in wage and hour cases from the inception of cases to trial, and all the way through the appeals process. Ms. Kinney has worked on hundreds of wage lawsuits and is the primary drafter of briefs and motions that are second to none.

- g. Attorney Rebecca Matlock graduated, magna cum laude, from the UALR William H. Bowen School of Law in 2015. Her practice focuses exclusively on employment law litigation, particularly in the FLSA context. As a law student, Ms. Matlock served as Executive Editor of the UALR Law Review, in which Ms. Matlock had an article published in the Spring of 2015 issue. Ms. Matlock has been practicing with Sanford Law Firm for approximately seven years.

18. The Sanford Law Firm's work focuses on representing workers in employment matters, and its lawyers focus their practices in the area of the FLSA and similar wage-and-hour cases. In the community of attorneys who focus their practice in this area of the law, the Sanford Law Firm has a strong reputation for its quality of work and diligent representation of its clients.

19. The lawyers at the Sanford Law Firm often have opportunities for greater responsibility and experience than many of their peers in the legal community with the same years of experience practicing law. What I mean by this is that because of the management style at the Sanford Law Firm, lesser-experienced attorneys are able to independently manage their own cases with the oversight of more experienced attorneys and are supported by a firm culture of collaboration and accessibility to all Sanford Law Firm attorneys. Lesser-experienced attorneys with Sanford Law Firm find themselves effectively navigating litigation with far more experienced opposing counsel, as well as successfully taking on far more responsibility than many of their peers of equal experience at other law firms.

20. Due to this culture of personal responsibility, conferences between

attorneys of differing levels of experience ensure that less experienced attorneys receive the benefits of the skills and knowledge of more experienced attorneys.

21. Sanford Law Firm represented Plaintiff in this case on a contingency basis and paid all out-of-pocket costs, including filing and service fees, copying costs, and other such expenses without any assurances that fees or costs would be recovered. The “contingency” fee award sought by Sanford Law Firm is not a contingency fee in the traditional sense whereby an attorney takes a portion of the plaintiff’s recovery. Rather, Sanford Law Firm relies on the fee-shifting provisions of the FLSA to recover their fees in this case.

22. Not only is there no guarantee that any fees and costs will be recovered in a contingency fee case, but any recovery made will be delayed as compared to clients who make up-front or monthly payments as litigation proceeds. In contingency fee cases, an attorney is not paid for months or even years, depending on how long it takes for litigation to conclude.

23. This type of work is time-consuming and rigorous, and the amount of time spent by our firm at each step in this case is reasonable. It is not uncommon in the course of my practice for clients with similar cases to incur attorney’s fees that are as much as or more than those in this case.

24. With these matters in mind, I reviewed the hourly rates for the attorneys and staff that the Sanford Law Firm is seeking in this case.

25. Based on my experience and knowledge, it is my opinion that these hourly rates are reasonable given the attorneys’ skills, expertise, and reputations, and they are within the range of rates awarded to attorneys with similar backgrounds and experience.

26. The request for attorney's fees and costs is based upon contemporaneous time and expense records maintained by Sanford Law Firm as a matter of ordinary and customary business practice. The time and billing records identify the amount of time expended, the tasks performed, the rate of the particular timekeeper involved, and the costs incurred. A true and accurate copy of a spreadsheet reflecting relevant legal services rendered and time expended on this case through February 8, 2023, is attached hereto as Exhibit A (hereinafter "Billing Spreadsheet").

27. Each task reflected in the attached Billing Spreadsheet was necessary to the successful resolution of this matter; the hours expended were actually expended on the topics stated; the time spent on each task was reasonable; and the rates claimed are also reasonable.

28. Conferences between the attorneys of the Sanford Law Firm, as well as between attorneys and staff of the Sanford Law Firm, are critical to the success of cases like this one because they improve the efficiency and quality of attorney work. Tasks can be delegated to Sanford Law Firm attorneys who are more experienced in certain types of projects or topics to increase the speed, accuracy or quality for accomplishing the task, or to attorneys whose hourly rates are lower to keep costs down, especially where the speed at which a task can be accomplished will be largely the same regardless of who performs the task. In the case of collective actions, in-house conferences allow attorneys to share the load of multi-plaintiff litigation.

29. Attorney conferences also increase efficiency because they allow attorneys to share their specific legal knowledge of particular topics, thereby preventing an attorney who is working on a project from having to spend time doing the research, creating a new

legal form, or otherwise “re-inventing the wheel.” In this way, even less experienced attorneys are able to work more efficiently and with greater quality than other attorneys of comparable experience. In fact, this “communal” knowledge benefits even more experienced attorneys who may be assisted by a less experienced attorney who simply has a particular skill set or knowledge of a topic that can be quickly shared through communication.

30. Because of Sanford Law Firm’s collective knowledge of and experience in FLSA work and use of attorney collaboration, Plaintiff’s counsel was able to complete tasks efficiently, which served to keep billing lower than it would have been without that knowledge, experience, and collaboration.

31. Attorney-client communication is also critical to the success of Sanford Law Firm cases. First, all communication from clients is important. In my experience, when a client feels he or she is being ignored by attorneys, that reduces the level of trust between the client and the attorney, which damages the attorney-client relationship. This, in turn, makes quality representation of the client extremely difficult and reduces efficiency. Further, attorneys must trust that their clients are reliable and accessible. Approaching deadlines, settlement conferences, and other issues in a case often demand immediate client response, so a healthy attorney-client relationship is a necessary part of the litigation process.

32. In order to protect the attorney-client relationship and privilege, entries in the Billing Spreadsheet that reveal the substance of conversations with clients or are otherwise privileged have the substantive portions removed and replaced with the phrase “PRIVILEGED INFORMATION.” However, the replaced language has been preserved

and can be produced for in-camera review if this Court believes that such a review is necessary in order to award fees related to these entries.

33. One of Sanford Law Firm's strengths is its array of attorneys with specialized knowledge or particular areas of expertise that can participate in cases where their unique skill sets are appropriately utilized. Not every attorney has to know everything about the FLSA, damages calculations, negotiation strategy, settlement agreements, or other aspects of litigation because every Sanford Law Firm attorney has access to all of the other Sanford Law Firm attorneys and their collective knowledge. This saves time because individual attorneys can gain knowledge through brief conversations with other attorneys rather than through time-consuming legal research on an issue. Even where legal research is required, the focus of that research can often be narrowed through consultation with other attorneys.

34. Where appropriate, Sanford Law Firm attorneys also delegate work to paralegals, law clerks and staff. The hourly rates charged for Sanford Law Firm's paralegals, law clerks and staff are reasonable. *See e.g., Haywood v. Wexford Health Sources, Inc.*, No. 16 CV 3566, 2021 U.S. Dist. LEXIS 104363, at *40 (N.D. Ill. June 3, 2021) ("Finally, the Court finds that \$125 per hour is a reasonable rate for paralegal work in this District."). The work performed by support staff members, in this case, was necessary to the litigation and the time spent on those tasks was reasonable.

35. The total overall billing reflected in the Billing Spreadsheet is \$6,158.00. Although the work reflected in the Billing Spreadsheet was reasonable, a 12% reduction in the total billing amount is sufficient to address any billing that the Court may find to be unnecessary or inefficient. Therefore, the total fee amount requested is \$5,419.04, which

accounts for this twelve percent reduction to overall billing.

36. In addition, court costs and recoverable expenses were also incurred in this matter. These costs, totaling \$820.50, are included in the Costs Invoice attached hereto as Exhibit B. The costs and expenses detailed in the Invoice that have been advanced by the Sanford Law Firm on behalf of Plaintiff, and which Plaintiff is contractually obligated to reimburse Sanford Law Firm out of any recovery in this case.

37. The amount of the costs requested is correct. The costs stated were necessarily incurred during the case, the services giving rise to the costs were actually and necessarily performed.

38. In sum, the total amount of fees and costs requested is \$6,239.54.

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on this 20th day July, 2023.

/s/ Josh Sanford
JOSH SANFORD

Date Billed On	Duration	Value	Description	Billed By	Rate	Billing Code
1/16/2023	0.1	\$29.00	Conference regarding case status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
1/16/2023	0.1	\$22.00	Conference regarding case status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
1/6/2023	0.1	\$9.00	Receive, read and prepare response to email(s) from D. Shears re: case question	Aysha Dixon	\$90.00	019 - Read and Respond to Email
1/5/2023	0.1	\$9.00	Receive, read and prepare response to email(s) from client re: case update	Aysha Dixon	\$90.00	019 - Read and Respond to Email
1/3/2023	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
12/30/2022	0.1	\$22.00	Receipt and review of Order re Local Rule 3.2 Annual Reminder	Colby Qualls	\$220.00	045 - Receipt and Review
12/22/2022	0.1	\$22.00	Conference with Aysha re Motion for Clerk's Entry of Default	Colby Qualls	\$220.00	054 - Conference (intra)
12/22/2022	0.1	\$9.00	Telephone Conference(s) with clerk's office re: motion for entry of default	Aysha Dixon	\$90.00	016 - Telephone Conference
12/22/2022	0.1	\$22.00	Receipt and review of Order re Clerk's Entry of Default	Colby Qualls	\$220.00	045 - Receipt and Review
12/22/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
12/22/2022	0.1	\$22.00	Conference with Aysha re client status update	Colby Qualls	\$220.00	054 - Conference (intra)
12/20/2022	0.1	\$29.00	Conference regarding status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
12/20/2022	0.1	\$22.00	Conference regarding status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
12/19/2022	0.1	\$29.00	Conference with AD re: client update	Stacy Gibson	\$290.00	054 - Conference (intra)
12/16/2022	0.1	\$29.00	Conference regarding case status	Stacy Gibson	\$290.00	054 - Conference (intra)
12/16/2022	0.1	\$22.00	Conference regarding case status	Colby Qualls	\$220.00	054 - Conference (intra)
11/28/2022	0.1	\$14.50	Conference with AD re client email	Marley Cash-Powell	\$145.00	054 - Conference (intra)
11/28/2022	0.1	\$9.00	Receive, read and prepare response to email(s) from client re: case update	Aysha Dixon	\$90.00	019 - Read and Respond to Email
11/3/2022	0.1	\$29.00	Conference regarding case status/next steps	Stacy Gibson	\$290.00	054 - Conference (intra)
11/3/2022	0.1	\$22.00	Conference regarding case status/next steps	Colby Qualls	\$220.00	054 - Conference (intra)
11/1/2022	0.1	\$22.00	Conference with Aysha re client status update	Colby Qualls	\$220.00	054 - Conference (intra)
11/1/2022	0.1	\$9.00	Receive, read and prepare response to email(s) from client re: case update	Aysha Dixon	\$90.00	019 - Read and Respond to Email
10/10/2022	0.1	\$22.00	Conference with Aysha re case status	Colby Qualls	\$220.00	054 - Conference (intra)
10/10/2022	0.1	\$9.00	Conference with Aysha re case status	Aysha Dixon	\$90.00	054 - Conference (intra)
10/10/2022	0.2	\$18.00	Perform legal research regarding Notice of Presentment	Aysha Dixon	\$90.00	014 - Legal Research
9/28/2022	0.3	\$27.00	Preparation and drafting of Notice of Presentment	Aysha Dixon	\$90.00	044 - Draft Document
9/28/2022	0.1	\$29.00	Conference regarding case status/next steps	Stacy Gibson	\$290.00	054 - Conference (intra)
9/28/2022	0.1	\$22.00	Conference regarding case status/next steps	Colby Qualls	\$220.00	054 - Conference (intra)
9/16/2022	0.1	\$9.00	Receive, read and prepare response to email(s) from client re: case update	Aysha Dixon	\$90.00	019 - Read and Respond to Email
9/12/2022	0.1	\$29.00	Conference regarding case status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
9/12/2022	0.1	\$9.00	Conference regarding case status/strategy	Aysha Dixon	\$90.00	054 - Conference (intra)
9/12/2022	0.1	\$22.00	Conference regarding case status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
8/15/2022	0.1	\$29.00	Conference regarding case status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
8/15/2022	0.1	\$9.00	Conference regarding case status/strategy	Aysha Dixon	\$90.00	054 - Conference (intra)
8/15/2022	0.1	\$22.00	Conference regarding case status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
8/3/2022	0.1	\$29.00	Conference regarding case status/next steps	Stacy Gibson	\$290.00	054 - Conference (intra)
8/3/2022	0.1	\$22.00	Conference regarding case status/next steps	Colby Qualls	\$220.00	054 - Conference (intra)
8/3/2022	0.1	\$9.00	Conference regarding case status/next steps	Aysha Dixon	\$90.00	054 - Conference (intra)
7/25/2022	0.1	\$22.00	Conference with SG via email re Motion for Clerk's Entry of Default	Colby Qualls	\$220.00	054 - Conference (intra)
7/25/2022	0.1	\$9.00	Compose, prepare and send correspondence to Client re: email re: case update	Aysha Dixon	\$90.00	018 - Compose Correspondence to Client
7/25/2022	0.3	\$87.00	Editing and revision of motion for clerks entry and declaration	Stacy Gibson	\$290.00	048 - Edit and Revision
7/25/2022	0.1	\$29.00	Conference with law clerk re: motion for clerks entry and declaration	Stacy Gibson	\$290.00	054 - Conference (intra)
7/25/2022	0.1	\$29.00	Conference with JS re: motion for clerk's entry and default	Stacy Gibson	\$290.00	054 - Conference (intra)
7/25/2022	0.1	\$29.00	Conference with paralegal re: filing proof of service	Stacy Gibson	\$290.00	054 - Conference (intra)
7/25/2022	0.2	\$29.00	Conference with AD/SG re filing proof of service	Marley Cash-Powell	\$145.00	054 - Conference (intra)
7/25/2022	0.1	\$9.00	Filing of Summons Returned Executed	Aysha Dixon	\$90.00	047 - Filing of
7/25/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
7/25/2022	0.1	\$29.00	Receive, read and prepare response to email(s) from CQ re: default motion	Stacy Gibson	\$290.00	019 - Read and Respond to Email
7/25/2022	0.1	\$9.00	Filing of Motion for Clerk's Entry of Default	Aysha Dixon	\$90.00	047 - Filing of
7/25/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
7/25/2022	0.1	\$29.00	Compose electronic communication: IOM re: service	Stacy Gibson	\$290.00	020 - Compose Electronic Communication
7/25/2022	0.1	\$47.00	Conference with SG: motion for clerk's default	Josh Sanford	\$470.00	053 - Conference
7/25/2022	0.1	\$47.00	Examination of return of summons	Josh Sanford	\$470.00	049 - Examination of - Examination of
7/25/2022	0.2	\$94.00	Editing and revision of motion and JS Dec default	Josh Sanford	\$470.00	048 - Edit and Revision
7/25/2022	0.1	\$47.00	Examination of filed motion	Josh Sanford	\$470.00	049 - Examination of - Examination of
7/19/2022	0.1	\$9.00	Work on Client's file: service update	Tracy Freeman	\$90.00	046 - Work on
7/18/2022	0.1	\$29.00	Conference regarding case status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
7/18/2022	0.1	\$9.00	Conference regarding case status/strategy	Aysha Dixon	\$90.00	054 - Conference (intra)

7/18/2022	0.1	\$22.00	Conference regarding case status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
6/30/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
6/30/2022	0.1	\$47.00	Examination of minute entry	Josh Sanford	\$470.00	049 - Examination of - Examination of
6/29/2022	0.1	\$11.00	Compose, prepare and send correspondence to CQ- declaration	Law Clerk	\$110.00	017 - Compose Correspondence
6/24/2022	0.1	\$22.00	Conference with law clerk re Motion for Entry of Default	Colby Qualls	\$220.00	054 - Conference (intra)
6/24/2022	0.2	\$29.00	Conference with SG/LC re default packet	Marley Cash-Powell	\$145.00	054 - Conference (intra)
6/24/2022	1.2	\$132.00	Perform legal research regarding military service for Defendant	Law Clerk	\$110.00	014 - Legal Research
6/24/2022	0.9	\$99.00	Preparation and drafting of declaration	Law Clerk	\$110.00	044 - Draft Document
6/24/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
6/24/2022	0.1	\$29.00	Conference with law clerk and MCP re: default	Stacy Gibson	\$290.00	054 - Conference (intra)
6/23/2022	0.1	\$29.00	Conference with CQ re: default	Stacy Gibson	\$290.00	054 - Conference (intra)
6/23/2022	0.1	\$22.00	Conference with SG re case strategy	Colby Qualls	\$220.00	054 - Conference (intra)
6/23/2022	0.3	\$66.00	Reviewing and Editing and revision of Motion for Clerk's Entry of Default	Colby Qualls	\$220.00	048 - Edit and Revision
6/23/2022	0.4	\$88.00	Reviewing and Editing and revision of Initial Status Report	Colby Qualls	\$220.00	048 - Edit and Revision
6/23/2022	0.1	\$9.00	Filing of Initial Status Report	Aysha Dixon	\$90.00	047 - Filing of
6/23/2022	0.2	\$29.00	Conference with CQ/TF re Default docs	Marley Cash-Powell	\$145.00	054 - Conference (intra)
6/23/2022	0.1	\$47.00	Examination of JSR-filed	Josh Sanford	\$470.00	049 - Examination of - Examination of
6/22/2022	0.1	\$29.00	Conference regarding case status/strategy	Stacy Gibson	\$290.00	054 - Conference (intra)
6/22/2022	0.1	\$22.00	Conference regarding case status/strategy	Colby Qualls	\$220.00	054 - Conference (intra)
6/22/2022	0.1	\$9.00	Conference regarding case status/strategy	Aysha Dixon	\$90.00	054 - Conference (intra)
6/15/2022	0.3	\$33.00	Preparation and drafting of Motion for Clerk's Entry of Default Judgment	Law Clerk	\$110.00	044 - Draft Document
6/14/2022	0.1	\$22.00	Conference with Tracy via email re status of service	Colby Qualls	\$220.00	054 - Conference (intra)
6/14/2022	0.1	\$22.00	Conference with JS via email re case status and strategy	Colby Qualls	\$220.00	054 - Conference (intra)
6/14/2022	0.2	\$44.00	Receive, read and prepare response to email(s) from named Defendant	Colby Qualls	\$220.00	019 - Read and Respond to Email
6/14/2022	0.1	\$47.00	Receive, read and prepare response to email(s) from CQ: case strategy	Josh Sanford	\$470.00	019 - Read and Respond to Email
6/14/2022	0.1	\$47.00	Examination of email to Defendant	Josh Sanford	\$470.00	049 - Examination of - Examination of
6/13/2022	0.1	\$22.00	Conference with Tracy via email re status of service	Colby Qualls	\$220.00	054 - Conference (intra)
6/13/2022	0.5	\$110.00	Reviewing and Editing and revision of Report of Parties' Planning Meeting	Colby Qualls	\$220.00	048 - Edit and Revision
6/13/2022	0.2	\$44.00	Perform legal research regarding related to service of process	Colby Qualls	\$220.00	014 - Legal Research
6/13/2022	0.3	\$66.00	Reviewing and Editing and revision of 26(f) Report	Colby Qualls	\$220.00	048 - Edit and Revision
6/13/2022	0.2	\$44.00	Conference with JS via email re case strategy and status	Colby Qualls	\$220.00	054 - Conference (intra)
6/8/2022	0.1	\$22.00	Compose and send electronic communication to Client	Colby Qualls	\$220.00	020 - Compose Electronic Communication
6/8/2022	0.4	\$88.00	Work on Client's file: Draft correspondence to Defendant; review and edit draft of 26(f) Report	Colby Qualls	\$220.00	046 - Work on
6/8/2022	0.1	\$22.00	Conference with SR re case strategy	Colby Qualls	\$220.00	054 - Conference (intra)
6/7/2022	0.1	\$22.00	Conference with Tracy via email re status of service	Colby Qualls	\$220.00	054 - Conference (intra)
6/7/2022	0.1	\$14.50	Conference with CQ re case strategy	Marley Cash-Powell	\$145.00	054 - Conference (intra)
6/7/2022	0.1	\$22.00	Conference with Marley re 26(f) Report	Colby Qualls	\$220.00	054 - Conference (intra)
6/7/2022	0.1	\$22.00	Receive, read and prepare response to email(s) from Client	Colby Qualls	\$220.00	019 - Read and Respond to Email
6/7/2022	0.1	\$22.00	Compose and send electronic communication to Client	Colby Qualls	\$220.00	020 - Compose Electronic Communication
6/7/2022	0.1	\$22.00	Conference with Aysha via email re documents from Client	Colby Qualls	\$220.00	054 - Conference (intra)
6/7/2022	0.1	\$22.00	Compose and send electronic communication to Client	Colby Qualls	\$220.00	020 - Compose Electronic Communication
6/6/2022	0.1	\$29.00	Compose electronic communication to JS re: defaulted defendant	Stacy Gibson	\$290.00	020 - Compose Electronic Communication
6/6/2022	0.1	\$47.00	Examination of IOM: status of service	Josh Sanford	\$470.00	049 - Examination of - Examination of
6/6/2022	0.1	\$47.00	Telephone Conference(s) with Def (left VM)	Josh Sanford	\$470.00	016 - Telephone Conference
6/6/2022	0.1	\$47.00	Preparation and drafting of IOM: next steps	Josh Sanford	\$470.00	044 - Draft Document
6/2/2022	0.1	\$22.00	Conference with Marley via electronic communication re 26(f) Report	Colby Qualls	\$220.00	054 - Conference (intra)
6/2/2022	0.7	\$101.50	Editing and revision of 26(f) report	Marley Cash-Powell	\$145.00	048 - Edit and Revision
6/1/2022	0.1	\$22.00	Conference with Tracy via email re status of service	Colby Qualls	\$220.00	054 - Conference (intra)
6/1/2022	0.7	\$63.00	Preparation and drafting of 26(f) report	Aysha Dixon	\$90.00	044 - Draft Document
5/28/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
5/26/2022	0.1	\$22.00	Receipt and review of Minute Entry regarding Scheduling Conference	Colby Qualls	\$220.00	045 - Receipt and Review
5/26/2022	0.1	\$47.00	Examination of minute entry	Josh Sanford	\$470.00	049 - Examination of - Examination of
5/9/2022	0.1	\$29.00	Conference re: case strategy/next steps	Stacy Gibson	\$290.00	054 - Conference (intra)
5/9/2022	0.1	\$22.00	Conference re: case strategy/next steps	Colby Qualls	\$220.00	054 - Conference (intra)
5/6/2022	0.2	\$44.00	Receive, read and prepare response to email(s) from Client	Colby Qualls	\$220.00	019 - Read and Respond to Email
5/5/2022	0.1	\$14.50	Work on Client's file: cleaning class audit dashboard; confirming CTJs if needed	Britt Staley	\$145.00	046 - Work on
4/29/2022	0.1	\$22.00	Conference with TF re summonses	Courtney Lowery	\$220.00	054 - Conference (intra)
4/29/2022	0.1	\$9.00	Work on Client's file: send complaint for service	Tracy Freeman	\$90.00	046 - Work on

4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/27/2022	0.1	\$9.00	Work on Client's file: process ECFs.	Tracy Freeman	\$90.00	046 - Work on
4/22/2022	0.1	\$22.00	Compose electronic communication to client re complaint allegations	Courtney Lowery	\$220.00	020 - Compose Electronic Communication
4/22/2022	0.5	\$110.00	Telephone Conference(s) between Attorney and Client re complaint allegations	Courtney Lowery	\$220.00	015 - Telephone Conference - Attorney and Client
4/22/2022	0.1	\$22.00	Compose electronic communication to client re add'l plaintiffs	Courtney Lowery	\$220.00	020 - Compose Electronic Communication
4/22/2022	0.3	\$66.00	Editing and revision of Complaint	Courtney Lowery	\$220.00	048 - Edit and Revision
4/22/2022	0.2	\$44.00	Conference with CQ re CMA handoff	Courtney Lowery	\$220.00	054 - Conference (intra)
4/22/2022	0.2	\$44.00	Work on Client's file: finalize and efile complaint and attorney appearances	Courtney Lowery	\$220.00	046 - Work on
4/22/2022	0.2	\$44.00	Editing and revision of Summons; email to court clerk re issuance of same	Courtney Lowery	\$220.00	048 - Edit and Revision
4/22/2022	0.1	\$47.00	Examination of IOM: draft lawsuit	Josh Sanford	\$470.00	049 - Examination of - Examination of
4/22/2022	0.1	\$47.00	Editing and revision of summons and CCS	Josh Sanford	\$470.00	048 - Edit and Revision
4/22/2022	0.1	\$47.00	Editing and revision of Complaint	Josh Sanford	\$470.00	048 - Edit and Revision
4/22/2022	0.1	\$47.00	Examination of clerks notices	Josh Sanford	\$470.00	049 - Examination of - Examination of
4/21/2022	0.1	\$22.00	Examination of intake notes	Courtney Lowery	\$220.00	049 - Examination of - Examination of
4/21/2022	0.1	\$22.00	Compose electronic communication to client re complaint allegations	Courtney Lowery	\$220.00	020 - Compose Electronic Communication
4/21/2022	0.8	\$176.00	Preparation and drafting of Complaint, Summonses and Attorney Appearance Forms	Courtney Lowery	\$220.00	044 - Draft Document
4/21/2022	0.1	\$22.00	Conference with CL via telephone re case status	Colby Qualls	\$220.00	054 - Conference (intra)
3/4/2022	0.2	\$44.00	Receive, read and prepare response to email(s) from Client	Colby Qualls	\$220.00	019 - Read and Respond to Email
3/3/2022	0.1	\$22.00	Conference with Aysha via email re case status update	Colby Qualls	\$220.00	054 - Conference (intra)
3/3/2022	0.2	\$44.00	Receive, read and prepare response to email(s) from Client	Colby Qualls	\$220.00	019 - Read and Respond to Email
2/2/2022	0.1	\$22.00	Conference with AS via email re case status and strategy	Colby Qualls	\$220.00	054 - Conference (intra)
2/1/2022	0.2	\$80.00	Receive and open firm file	Anna Stiritz	\$400.00	012 - Open File
2/1/2022	0.1	\$47.00	Examination of IOM: potential FLSA case	Josh Sanford	\$470.00	049 - Examination of - Examination of
2/1/2022	0.2	\$94.00	Conference with AS: potential FLSA case	Josh Sanford	\$470.00	053 - Conference
2/1/2022	0.1	\$47.00	Preparation and drafting of memo to client	Josh Sanford	\$470.00	044 - Draft Document
2/1/2022	0.1	\$47.00	Examination of signed contract	Josh Sanford	\$470.00	049 - Examination of - Examination of
2/1/2022	0.1	\$47.00	Receive, read and prepare response to email(s) from AS: case management	Josh Sanford	\$470.00	019 - Read and Respond to Email
2/1/2022	0.1	\$47.00	Examination of IOM: new case info	Josh Sanford	\$470.00	049 - Examination of - Examination of
2/1/2022	0.3	\$33.00	Work on Client's file: check status of current lawsuit against Defendant	Michael Stiritz	\$110.00	046 - Work on

Date Billed On	Billed By	Description: Unredacted	Description: Redacted	Duration	Value	Rate	Category	Billing Code	Entry #
2/1/2022	Anna Stirtz	Receive and open firm file	Receive and open firm file	0.20	\$80.00	\$400.00		012 - Open File	1
2/1/2022	Josh Sanford	Examination of IOM: potential FLSA case	Examination of IOM: potential FLSA case	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	2
2/1/2022	Josh Sanford	Conference with AS: potential FLSA case	Conference with AS: potential FLSA case	0.20	\$94.00	\$470.00		053 - Conference	3
2/1/2022	Josh Sanford	Preparation and drafting of memo to client	Preparation and drafting of memo to client	0.10	\$47.00	\$470.00		044 - Draft Document	4
2/1/2022	Josh Sanford	Examination of signed contract	Examination of signed contract	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	5
2/1/2022	Josh Sanford	Receive, read and prepare response to email(s) from AS: case management	Receive, read and prepare response to email(s) from AS: case management	0.10	\$47.00	\$470.00		019 - Read and Respond to Email	6
2/1/2022	Josh Sanford	Examination of IOM: new case info	Examination of IOM: new case info	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	7
2/1/2022	Michael Stirtz	Work on Client's file: check status of current lawsuit against Defendant	Work on Client's file: check status of current lawsuit against Defendant	0.30	\$33.00	\$110.00		046 - Work on	8
2/2/2022	Colby Qualls	Conference with AS via email re case status and strategy	Conference with AS via email re case status and strategy	0.10	\$22.00	\$220.00		054 - Conference (intra)	9
3/3/2022	Colby Qualls	Conference with Aysha via email re case status update	Conference with Aysha via email re case status update	0.10	\$22.00	\$220.00		054 - Conference (intra)	10
3/3/2022	Colby Qualls	Receive, read and prepare response to email(s) from Client	Receive, read and prepare response to email(s) from Client	0.20	\$44.00	\$220.00		019 - Read and Respond to Email	11
3/4/2022	Colby Qualls	Receive, read and prepare response to email(s) from Client	Receive, read and prepare response to email(s) from Client	0.20	\$44.00	\$220.00		019 - Read and Respond to Email	12
4/21/2022	Colby Qualls	Conference with CL via telephone re case status	Conference with CL via telephone re case status	0.10	\$22.00	\$220.00		054 - Conference (intra)	13
4/21/2022	Courtney Lowery	Examination of intake notes	Examination of intake notes	0.10	\$22.00	\$220.00		049 - Examination of - Examination of	14
4/21/2022	Courtney Lowery	Compose electronic communication to client re complaint allegations	Compose electronic communication to client re PRIVILEGED INFORMATION	0.10	\$22.00	\$220.00		020 - Compose Electronic Communication	15
4/21/2022	Courtney Lowery	Preparation and drafting of Complaint, Summonses and Attorney Appearance Forms	Preparation and drafting of Complaint, Summonses and Attorney Appearance Forms	0.80	\$176.00	\$220.00		044 - Draft Document	16
4/22/2022	Courtney Lowery	Compose electronic communication to client re complaint allegations	Compose electronic communication to client re complaint allegations	0.10	\$22.00	\$220.00		020 - Compose Electronic Communication	17
4/22/2022	Courtney Lowery	Telephone Conference(s) between Attorney and Client re complaint allegations	Telephone Conference(s) between Attorney and Client re PRIVILEGED INFORMATION	0.50	\$110.00	\$220.00		015 - Telephone Conference - Attorney and Client	18
4/22/2022	Courtney Lowery	Editing and revision of Complaint	Editing and revision of Complaint	0.30	\$66.00	\$220.00		048 - Edit and Revision	20
4/22/2022	Courtney Lowery	Conference with CQ re CMA handoff	Conference with CQ re CMA handoff	0.20	\$44.00	\$220.00		054 - Conference (intra)	21
4/22/2022	Courtney Lowery	Work on Client's file: finalize and efile complaint and attorney appearances	Work on Client's file: finalize and efile complaint and attorney appearances	0.20	\$44.00	\$220.00		046 - Work on	22
4/22/2022	Courtney Lowery	Editing and revision of Summonses; email to court clerk re issuance of same	Editing and revision of Summonses; email to court clerk re issuance of same	0.20	\$44.00	\$220.00		048 - Edit and Revision	23
4/22/2022	Josh Sanford	Examination of IOM: draft lawsuit	Examination of IOM: draft lawsuit	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	24
4/22/2022	Josh Sanford	Editing and revision of summonses and CCS	Editing and revision of summonses and CCS	0.10	\$47.00	\$470.00		048 - Edit and Revision	25
4/22/2022	Josh Sanford	Editing and revision of Complaint	Editing and revision of Complaint	0.10	\$47.00	\$470.00		048 - Edit and Revision	26
4/22/2022	Josh Sanford	Examination of clerks notices	Examination of clerks notices	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	27
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	28
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	29
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	30
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	31
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	32
4/27/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	33
4/29/2022	Courtney Lowery	Conference with TF re summonses	Conference with TF re summonses	0.10	\$22.00	\$220.00		054 - Conference (intra)	34
4/29/2022	Staff	Work on Client's file: send complaint for service	Work on Client's file: send complaint for service	0.10	\$9.00	\$90.00		046 - Work on	35
5/5/2022	Paralegal	Work on Client's file: cleaning class audit dashboard; confirming CTJs if needed	Work on Client's file: cleaning class audit dashboard; confirming CTJs if needed	0.10	\$12.50	\$125.00		046 - Work on	36
5/6/2022	Colby Qualls	Receive, read and prepare response to email(s) from Client	Receive, read and prepare response to email(s) from Client	0.20	\$44.00	\$220.00		019 - Read and Respond to Email	37
5/9/2022	Colby Qualls	Conference re: case strategy/next steps	Conference re: case strategy/next steps	0.10	\$22.00	\$220.00		054 - Conference (intra)	38
5/9/2022	Stacy Gibson	Conference re: case strategy/next steps	Conference re: case strategy/next steps	0.10	\$29.00	\$290.00		054 - Conference (intra)	39
5/26/2022	Colby Qualls	Receipt and review of Minute Entry regarding Scheduling Conference	Receipt and review of Minute Entry regarding Scheduling Conference	0.10	\$22.00	\$220.00		045 - Receipt and Review	40
5/26/2022	Josh Sanford	Examination of minute entry	Examination of minute entry	0.10	\$47.00	\$470.00		049 - Examination of - Examination of	41
5/28/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00		046 - Work on	42
6/1/2022	Paralegal	Preparation and drafting of 26(f) report	Preparation and drafting of 26(f) report	0.70	\$87.50	\$125.00		044 - Draft Document	43
6/1/2022	Colby Qualls	Conference with Tracy via email re status of service	Conference with Tracy via email re status of service	0.10	\$22.00	\$220.00		054 - Conference (intra)	44
6/1/2022	Colby Qualls	Conference with Tracy via email re status of service	Conference with Tracy via email re status of service	0.10	\$22.00	\$220.00		054 - Conference (intra)	45

6/2/2022	Colby Qualls	Conference with Marley via electronic communication re 26(f) Report	Conference with Marley via electronic communication re 26(f) Report	0.10	\$22.00	\$220.00	054 - Conference (intra)	46
6/2/2022	Paralegal	Editing and revision of 26(f) report	Editing and revision of 26(f) report	0.70	\$87.50	\$125.00	048 - Edit and Revision	47
6/6/2022	Josh Sanford	Examination of IOM: status of service	Examination of IOM: status of service	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	48
6/6/2022	Josh Sanford	Telephone Conference(s) with Def (left VM)	Telephone Conference(s) with Def (left VM)	0.10	\$47.00	\$470.00	016 - Telephone Conference	49
6/6/2022	Josh Sanford	Preparation and drafting of IOM: next steps	Preparation and drafting of IOM: next steps	0.10	\$47.00	\$470.00	044 - Draft Document	50
6/6/2022	Stacy Gibson	Compose electronic communication to JS re: defaulted defendant	Compose electronic communication to JS re: defaulted defendant	0.10	\$29.00	\$290.00	020 - Compose Electronic Communication	51
6/7/2022	Colby Qualls	Conference with Tracy via email re status of service	Conference with Tracy via email re status of service	0.10	\$22.00	\$220.00	054 - Conference (intra)	52
6/7/2022	Colby Qualls	Conference with Marley re 26(f) Report	Conference with Marley re 26(f) Report	0.10	\$22.00	\$220.00	054 - Conference (intra)	53
6/7/2022	Colby Qualls	Receive, read and prepare response to email(s) from Client	Receive, read and prepare response to email(s) from Client	0.10	\$22.00	\$220.00	019 - Read and Respond to Email	54
6/7/2022	Colby Qualls	Compose and send electronic communication to Client	Compose and send electronic communication to Client	0.10	\$22.00	\$220.00	020 - Compose Electronic Communication	55
6/7/2022	Colby Qualls	Conference with Aysha via email re documents from Client	Conference with Aysha via email re documents from Client	0.10	\$22.00	\$220.00	054 - Conference (intra)	56
6/7/2022	Colby Qualls	Compose and send electronic communication to Client	Compose and send electronic communication to Client	0.10	\$22.00	\$220.00	020 - Compose Electronic Communication	57
6/7/2022	Paralegal	Conference with CQ re case strategy	Conference with CQ re case strategy	0.10	\$12.50	\$125.00	054 - Conference (intra)	58
6/8/2022	Colby Qualls	Compose and send electronic communication to Client	Compose and send electronic communication to Client	0.10	\$22.00	\$220.00	020 - Compose Electronic Communication	59
6/8/2022	Colby Qualls	Work on Client's file: Draft correspondence to Defendant; review and edit draft of 26(f) Report	Work on Client's file: Draft correspondence to Defendant; review and edit draft of 26(f) Report	0.40	\$88.00	\$220.00	046 - Work on	60
6/8/2022	Colby Qualls	Conference with SR re case strategy	Conference with SR re case strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	61
6/13/2022	Colby Qualls	Conference with Tracy via email re status of service	Conference with Tracy via email re status of service	0.10	\$22.00	\$220.00	054 - Conference (intra)	62
6/13/2022	Colby Qualls	Reviewing and Editing and revision of Report of Parties' Planning Meeting	Reviewing and Editing and revision of Report of Parties' Planning Meeting	0.50	\$110.00	\$220.00	048 - Edit and Revision	63
6/13/2022	Colby Qualls	Perform legal research regarding related to service of process	Perform legal research regarding related to service of process	0.20	\$44.00	\$220.00	014 - Legal Research	64
6/13/2022	Colby Qualls	Reviewing and Editing and revision of 26(f) Report	Reviewing and Editing and revision of 26(f) Report	0.30	\$66.00	\$220.00	048 - Edit and Revision	65
6/13/2022	Colby Qualls	Conference with JS via email re case strategy and status	Conference with JS via email re case strategy and status	0.20	\$44.00	\$220.00	054 - Conference (intra)	66
6/14/2022	Colby Qualls	Conference with Tracy via email re status of service	Conference with Tracy via email re status of service	0.10	\$22.00	\$220.00	054 - Conference (intra)	67
6/14/2022	Colby Qualls	Conference with JS via email re case status and strategy	Conference with JS via email re case status and strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	68
6/14/2022	Colby Qualls	Receive, read and prepare response to email(s) from named Defendant	Receive, read and prepare response to email(s) from named Defendant	0.20	\$44.00	\$220.00	019 - Read and Respond to Email	69
6/14/2022	Josh Sanford	Receive, read and prepare response to email(s) from CQ: case strategy	Receive, read and prepare response to email(s) from CQ: case strategy	0.10	\$47.00	\$470.00	019 - Read and Respond to Email	70
6/14/2022	Josh Sanford	Examination of email to Defendant	Examination of email to Defendant	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	71
6/15/2022	Law Clerk	Preparation and drafting of Motion for Clerk's Entry of Default Judgment	Preparation and drafting of Motion for Clerk's Entry of Default Judgment	0.30	\$33.00	\$110.00	044 - Draft Document	72
6/22/2022	Paralegal	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$12.50	\$125.00	054 - Conference (intra)	73
6/22/2022	Colby Qualls	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	74
6/22/2022	Stacy Gibson	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	75
6/23/2022	Paralegal	Filing of Initial Status Report	Filing of Initial Status Report	0.10	\$12.50	\$125.00	047 - Filing of	76
6/23/2022	Colby Qualls	Conference with SG re case strategy	Conference with SG re case strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	77
6/23/2022	Colby Qualls	Reviewing and Editing and revision of Motion for Clerk's Entry of Default	Reviewing and Editing and revision of Motion for Clerk's Entry of Default	0.30	\$66.00	\$220.00	048 - Edit and Revision	78
6/23/2022	Colby Qualls	Reviewing and Editing and revision of Initial Status Report	Reviewing and Editing and revision of Initial Status Report	0.40	\$88.00	\$220.00	048 - Edit and Revision	79
6/23/2022	Josh Sanford	Examination of JSR-filed	Examination of JSR-filed	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	80
6/23/2022	Paralegal	Conference with CQ/TF re Default docs	Conference with CQ/TF re Default docs	0.20	\$25.00	\$125.00	054 - Conference (intra)	81
6/23/2022	Stacy Gibson	Conference with CQ re: default	Conference with CQ re: default	0.10	\$29.00	\$290.00	054 - Conference (intra)	82
6/24/2022	Colby Qualls	Conference with law clerk re Motion for Entry of Default	Conference with law clerk re Motion for Entry of Default	0.10	\$22.00	\$220.00	054 - Conference (intra)	83
6/24/2022	Law Clerk	Perform legal research regarding military service for Defendant	Perform legal research regarding military service for Defendant	1.20	\$132.00	\$110.00	014 - Legal Research	84
6/24/2022	Law Clerk	Preparation and drafting of declaration	Preparation and drafting of declaration	0.90	\$99.00	\$110.00	044 - Draft Document	85
6/24/2022	Paralegal	Conference with SG/LC re default packet	Conference with SG/LC re default packet	0.20	\$25.00	\$125.00	054 - Conference (intra)	86

6/24/2022	Stacy Gibson	Conference with law clerk and MCP re: default	Conference with law clerk and MCP re: default	0.10	\$29.00	\$290.00	054 - Conference (intra)	87
6/24/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	88
6/29/2022	Law Clerk	Compose, prepare and send correspondence to CQ- declaration	Compose, prepare and send correspondence to CQ- declaration	0.10	\$11.00	\$110.00	017 - Compose Correspondence	89
6/30/2022	Josh Sanford	Examination of minute entry	Examination of minute entry	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	90
6/30/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	91
7/18/2022	Paralegal	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$12.50	\$125.00	054 - Conference (intra)	92
7/18/2022	Colby Qualls	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	93
7/18/2022	Stacy Gibson	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	94
7/19/2022	Staff	Work on Client's file: service update	Work on Client's file: service update	0.10	\$9.00	\$90.00	046 - Work on	95
7/25/2022	Paralegal	Compose, prepare and send correspondence to Client re: email re: case update	Compose, prepare and send correspondence to Client re: email re: case update	0.10	\$12.50	\$125.00	018 - Compose Correspondence to Client	96
7/25/2022	Paralegal	Filing of Summons Returned Executed	Filing of Summons Returned Executed	0.10	\$12.50	\$125.00	047 - Filing of	97
7/25/2022	Paralegal	Filing of Motion for Clerk's Entry of Default	Filing of Motion for Clerk's Entry of Default	0.10	\$12.50	\$125.00	047 - Filing of	98
7/25/2022	Colby Qualls	Conference with SG via email re Motion for Clerk's Entry of Default	Conference with SG via email re Motion for Clerk's Entry of Default	0.10	\$22.00	\$220.00	054 - Conference (intra)	99
7/25/2022	Josh Sanford	Conference with SG: motion for clerk's default	Conference with SG: motion for clerk's default	0.10	\$47.00	\$470.00	053 - Conference	100
7/25/2022	Josh Sanford	Examination of return of summons	Examination of return of summons	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	101
7/25/2022	Josh Sanford	Editing and revision of motion and JS Dec default	Editing and revision of motion and JS Dec default	0.20	\$94.00	\$470.00	048 - Edit and Revision	102
7/25/2022	Josh Sanford	Examination of filed motion	Examination of filed motion	0.10	\$47.00	\$470.00	049 - Examination of - Examination of	103
7/25/2022	Paralegal	Conference with AD/SG re filing proof of service	Conference with AD/SG re filing proof of service	0.20	\$25.00	\$125.00	054 - Conference (intra)	104
7/25/2022	Stacy Gibson	Editing and revision of motion for clerks entry and declaration	Editing and revision of motion for clerks entry and declaration	0.30	\$87.00	\$290.00	048 - Edit and Revision	105
7/25/2022	Stacy Gibson	Conference with law clerk re: motion for clerks entry and declaration	Conference with law clerk re: motion for clerks entry and declaration	0.10	\$29.00	\$290.00	054 - Conference (intra)	106
7/25/2022	Stacy Gibson	Conference with JS re: motion for clerk's entry and default	Conference with JS re: motion for clerk's entry and default	0.10	\$29.00	\$290.00	054 - Conference (intra)	107
7/25/2022	Stacy Gibson	Conference with paralegal re: filing proof of service	Conference with paralegal re: filing proof of service	0.10	\$29.00	\$290.00	054 - Conference (intra)	108
7/25/2022	Stacy Gibson	Receive, read and prepare response to email(s) from CQ re: default motion	Receive, read and prepare response to email(s) from CQ re: default motion	0.10	\$29.00	\$290.00	019 - Read and Respond to Email	109
7/25/2022	Stacy Gibson	Compose electronic communication: IOM re: service	Compose electronic communication: IOM re: service	0.10	\$29.00	\$290.00	020 - Compose Electronic Communication	110
7/25/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	111
7/25/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	112
8/3/2022	Paralegal	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$12.50	\$125.00	054 - Conference (intra)	113
8/3/2022	Colby Qualls	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$22.00	\$220.00	054 - Conference (intra)	114
8/3/2022	Stacy Gibson	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$29.00	\$290.00	054 - Conference (intra)	115
8/15/2022	Paralegal	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$12.50	\$125.00	054 - Conference (intra)	116
8/15/2022	Colby Qualls	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	117
8/15/2022	Stacy Gibson	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	118
9/12/2022	Paralegal	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$12.50	\$125.00	054 - Conference (intra)	119
9/12/2022	Colby Qualls	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	120
9/12/2022	Stacy Gibson	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	121
9/16/2022	Paralegal	Receive, read and prepare response to email(s) from client re: case update	Receive, read and prepare response to email(s) from client re: case update	0.10	\$12.50	\$125.00	019 - Read and Respond to Email	122
9/28/2022	Paralegal	Preparation and drafting of Notice of Presentment	Preparation and drafting of Notice of Presentment	0.30	\$37.50	\$125.00	044 - Draft Document	123
9/28/2022	Colby Qualls	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$22.00	\$220.00	054 - Conference (intra)	124
9/28/2022	Stacy Gibson	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$29.00	\$290.00	054 - Conference (intra)	125
10/10/2022	Paralegal	Conference with Aysha re case status	Conference with Aysha re case status	0.10	\$12.50	\$125.00	054 - Conference (intra)	126
10/10/2022	Paralegal	Perform legal research regarding Notice of Presentment	Perform legal research regarding Notice of Presentment	0.20	\$25.00	\$125.00	014 - Legal Research	127
10/10/2022	Colby Qualls	Conference with Aysha re case status	Conference with Aysha re case status	0.10	\$22.00	\$220.00	054 - Conference (intra)	128
11/1/2022	Paralegal	Receive, read and prepare response to email(s) from client re: case update	Receive, read and prepare response to email(s) from client re: case update	0.10	\$12.50	\$125.00	019 - Read and Respond to Email	129
11/1/2022	Colby Qualls	Conference with Aysha re client status update	Conference with Aysha re client status update	0.10	\$22.00	\$220.00	054 - Conference (intra)	130
11/3/2022	Colby Qualls	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$22.00	\$220.00	054 - Conference (intra)	131
11/3/2022	Stacy Gibson	Conference regarding case status/next steps	Conference regarding case status/next steps	0.10	\$29.00	\$290.00	054 - Conference (intra)	132
11/28/2022	Paralegal	Receive, read and prepare response to email(s) from client re: case update	Receive, read and prepare response to email(s) from client re: case update	0.10	\$12.50	\$125.00	019 - Read and Respond to Email	133
11/28/2022	Paralegal	Conference with AD re client email	Conference with AD re client email	0.10	\$12.50	\$125.00	054 - Conference (intra)	134
12/16/2022	Colby Qualls	Conference regarding case status	Conference regarding case status	0.10	\$22.00	\$220.00	054 - Conference (intra)	135

12/16/2022	Stacy Gibson	Conference regarding case status	Conference regarding case status	0.10	\$29.00	\$290.00	054 - Conference (intra)	136
12/19/2022	Stacy Gibson	Conference with AD re: client update	Conference with AD re: client update	0.10	\$29.00	\$290.00	054 - Conference (intra)	137
12/20/2022	Colby Qualls	Conference regarding status/strategy	Conference regarding status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	138
12/20/2022	Stacy Gibson	Conference regarding status/strategy	Conference regarding status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	139
12/22/2022	Paralegal	Telephone Conference(s) with clerk's office re: motion for entry of default	Telephone Conference(s) with clerk's office re: motion for entry of default	0.10	\$12.50	\$125.00	016 - Telephone Conference	140
12/22/2022	Colby Qualls	Conference with Aysha re Motion for Clerk's Entry of Default	Conference with Aysha re Motion for Clerk's Entry of Default	0.10	\$22.00	\$220.00	054 - Conference (intra)	141
12/22/2022	Colby Qualls	Receipt and review of Order re Clerk's Entry of Default	Receipt and review of Order re Clerk's Entry of Default	0.10	\$22.00	\$220.00	045 - Receipt and Review	142
12/22/2022	Colby Qualls	Conference with Aysha re client status update	Conference with Aysha re client status update	0.10	\$22.00	\$220.00	054 - Conference (intra)	143
12/22/2022	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	144
12/30/2022	Colby Qualls	Receipt and review of Order re Local Rule 3.2 Annual Reminder	Receipt and review of Order re Local Rule 3.2 Annual Reminder	0.10	\$22.00	\$220.00	045 - Receipt and Review	145
1/3/2023	Staff	Work on Client's file: process ECFs.	Work on Client's file: process ECFs.	0.10	\$9.00	\$90.00	046 - Work on	146
1/5/2023	Paralegal	Receive, read and prepare response to email(s) from client re: case update	Receive, read and prepare response to email(s) from client re: case update	0.10	\$12.50	\$125.00	019 - Read and Respond to Email	147
1/6/2023	Paralegal	Receive, read and prepare response to email(s) from D. Shears re: case question	Receive, read and prepare response to email(s) from D. Shears re: PRIVILEGED INFORMATION	0.10	\$12.50	\$125.00	019 - Read and Respond to Email	148
1/16/2023	Colby Qualls	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$22.00	\$220.00	054 - Conference (intra)	149
1/16/2023	Stacy Gibson	Conference regarding case status/strategy	Conference regarding case status/strategy	0.10	\$29.00	\$290.00	054 - Conference (intra)	150
1/17/2023	Vanessa Kinney	Receipt and review of default judgment; set up billing spreadsheet; search prior defaults as guide	Receipt and review of default judgment; set up billing spreadsheet; search prior defaults as guide	0.60	\$240.00	\$400.00		151
1/17/2023	Vanessa Kinney	Work on Client's file: review billing spreadsheet entries for attorney-client privilege	Work on Client's file: review billing spreadsheet entries for attorney-client privilege	0.40	\$160.00	\$400.00		152
1/17/2023	Vanessa Kinney	Preparation and drafting of Declaration of Josh Sanford; costs invoice; work on billing spreadsheet, mark unclear billing entries, create summary table	Preparation and drafting of Declaration of Josh Sanford; costs invoice; work on billing spreadsheet, mark unclear billing entries, create summary tables	0.90	\$360.00	\$400.00		153

25.00 \$5,718.00

Date Billed On	Billed By	Duration	Value	Rate	Category	Billing Code	Entry #
	Anna Stiritz Total	0.20	\$80.00				
	Colby Qualls Total	6.90	\$1,518.00				
	Courtney Lowery Total	2.60	\$572.00				
	Josh Sanford Total	2.40	\$1,128.00				
	Law Clerk Total	2.50	\$275.00				
	Michael Stiritz Total	0.30	\$33.00				
	Paralegal Total	4.40	\$484.00				
	Stacy Gibson Total	2.30	\$667.00				
	Staff Total	1.50	\$135.00				
	Grand Total	23.10	\$4,892.00				

Date		Amount	Description
10/12/2022		\$184.00	Attempted Service Fee/Research Fee to ABC Legal
7/22/2022		\$106.50	Attempted Service Fee to ABC Legal
6/10/2022		\$64.00	Service Fee to ABC Legal
5/18/2022		\$64.00	Service Fee to ABC Legal
4/27/2022		\$402.00	Filing Fee
Total	Sum	\$820.50	
	Count		